

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ADEIA TECHNOLOGIES, INC., ADEIA
GUIDES INC. and ADEIA MEDIA
HOLDINGS INC.,

Plaintiffs,

v.

THE WALT DISNEY COMPANY, DISNEY
MEDIA AND ENTERTAINMENT
DISTRIBUTION LLC, DISNEY DTC LLC,
DISNEY STREAMING SERVICES LLC,
DISNEY ENTERTAINMENT & SPORTS
LLC, DISNEY PLATFORM
DISTRIBUTION, INC., BAMTECH, LLC,
HULU, LLC, and ESPN, INC.

Defendants.

Civil Action No: 24-cv-1231-MN

JURY TRIAL DEMANDED

PLAINTIFFS' ANSWER TO COUNTERCLAIMS OF DEFENDANTS

Plaintiffs Adeia Technologies Inc., Adeia Guides Inc., and Adeia Media Holdings Inc. (collectively, "Plaintiffs" or "Adeia"), by and through their attorneys, hereby answer and respond to the Counterclaims filed by Defendants The Walt Disney Company, Disney Media And Entertainment Distribution LLC, Disney DTC LLC, Disney Streaming Services LLC, Disney Entertainment & Sports LLC, Disney Platform Distribution, Inc., BAMTech, LLC, Hulu, LLC, and ESPN, Inc. ("Defendants"). *See* D.I. 66 at 113–24. Plaintiffs deny all allegations not specifically admitted. Except as otherwise noted, the following headings and number paragraphs correspond to the headings and numbered paragraphs set forth in Defendants' Counterclaims. Plaintiffs do not consider the headings to be allegations to which a response is necessary and do not admit the truth of any allegations contained in those headings. To the extent that a particular heading can be construed as an allegation, Plaintiffs specifically deny all such allegations. Plaintiffs respond to Defendants' Counterclaims as follows:

INTRODUCTION

1. Admitted.
2. Denied.
3. Denied.
4. Plaintiffs admit that Defendants purport to bring the Counterclaims as described in Paragraph 4. Otherwise, denied.

PARTIES

5. Admitted, on information and belief.
6. Admitted, on information and belief.
7. Admitted, on information and belief.
8. Admitted, on information and belief.
9. Admitted, on information and belief.
10. Admitted, on information and belief.
11. Admitted, on information and belief.
12. Admitted, on information and belief.
13. Admitted, on information and belief.
14. Admitted.
15. Admitted.
16. Plaintiffs admit that Adeia Media Holdings LLC was a Delaware limited liability company that is now referred to as Adeia Media Holdings Inc. *See* D.I. 47; D.I. 49. Plaintiffs further admit that Adeia Media Holdings Inc. has a principal place of business at 3025 Orchard

Parkway, San Jose, California 95134, and is a wholly owned subsidiary of Adeia Inc. Otherwise, denied.

JURISDICTION AND VENUE

17. Plaintiffs admit that the Court has subject matter jurisdiction over the Counterclaims in this case. The remaining allegations in this paragraph contain conclusions of law to which no response is required and are therefore denied.

18. Plaintiffs admit that, for purposes of this action only, the Court has personal jurisdiction over Plaintiffs. Plaintiffs further admit that Adeia's complaint (D.I. 1) claimed that Adeia Technologies is a Delaware corporation, Adeia Guides is a Delaware corporation, and Adeia Media Holdings was a Delaware limited liability company. The remaining allegations in this paragraph contain conclusions of law to which no response is required and are therefore denied.

19. Plaintiffs admit that, for purposes of this action only, the Court has personal jurisdiction over Plaintiffs. The remaining allegations in this paragraph contain conclusions of law to which no response is required and are therefore denied.

20. Plaintiffs admit that, for purposes of this action only, venue is proper in this District. Plaintiffs further admit that Plaintiffs filed their Complaint in this District. The remaining

allegations in this paragraph contain conclusions of law to which no response is required and are therefore denied.

FIRST COUNTERCLAIM
(Non-Infringement of the '639 Patent)

21. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

22. Denied.

23. Admitted.

24. Denied.

25. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '639 Patent. Otherwise, denied.

SECOND COUNTERCLAIM
(Non-Infringement of the '987 Patent)

26. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

27. Denied.

28. Admitted.

29. Denied.

30. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '987 Patent. Otherwise, denied.

THIRD COUNTERCLAIM
(Non-Infringement of the '595 Patent)

31. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

32. Denied.

33. Admitted.

34. Denied.

35. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '595 Patent. Otherwise, denied.

FOURTH COUNTERCLAIM
(Non-Infringement of the '324 Patent)

36. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

37. Denied.

38. Admitted.

39. Denied.

40. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '324 Patent. Otherwise, denied.

FIFTH COUNTERCLAIM
(Non-Infringement of the '705 Patent)

41. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

42. Denied.

43. Admitted.

44. Denied.

45. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '705 Patent. Otherwise, denied.

SIXTH COUNTERCLAIM
(Non-Infringement of the '428 Patent)

46. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

47. Denied.

48. Admitted.

49. Denied.

50. Plaintiffs admit that Disney purports to seek a declaration that it does not infringe any valid and enforceable claim of the '428 Patent. Otherwise, denied.

SEVENTH COUNTERCLAIM
(Invalidity of the '639 Patent)

51. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

52. Denied.

53. Admitted.

54. Denied.

55. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '639 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

EIGHTH COUNTERCLAIM
(Invalidity of the '987 Patent)

56. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

57. Denied.

58. Admitted.

59. Denied.

60. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '987 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

NINTH COUNTERCLAIM
(Invalidity of the '595 Patent)

61. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

62. Denied.

63. Admitted.

64. Denied.

65. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '595 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

TENTH COUNTERCLAIM
(Invalidity of the '324 Patent)

66. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

67. Denied.

68. Admitted.

69. Denied.

70. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '324 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

ELEVENTH COUNTERCLAIM
(Invalidity of the '705 Patent)

71. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

72. Denied.

73. Admitted.

74. Denied.

75. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '705 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

TWELFTH COUNTERCLAIM
(Invalidity of the '428 Patent)

76. Plaintiffs incorporate by reference their answers to the preceding paragraphs. Otherwise, this paragraph does not contain any factual allegations. To the extent a response is required, Plaintiffs deny all allegations of this paragraph.

77. Denied.

78. Admitted.

79. Denied.

80. Plaintiffs admit that Disney purports to seek a declaration that that one or more claims of the '428 Patent are invalid for failing to meet the conditions for patentability under 35 U.S.C. § 1 *et seq.* Otherwise, denied.

RESERVATION OF ADDITIONAL COUNTERCLAIMS

81. Plaintiffs admit that Disney purports to reserve the right to allege additional counterclaims that may be developed through discovery in this Action, related proceedings, or otherwise. Otherwise, denied.

PRAYER FOR RELIEF

Plaintiffs deny that Defendants are entitled to any relief.

AFFIRMATIVE DEFENSE

Disney has failed to state a claim upon which relief can be granted.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues so triable.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs the relief requested in their Complaint, grant judgment in Plaintiffs' favor and against Disney on the

counterclaims, award Plaintiffs their fees and costs, and grant such further relief as the Court deems just and proper.

Dated: November 14, 2025

Respectfully submitted,

Of Counsel:

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